

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
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January 13, 2016

BY ECF

The Honorable Denise Cote
United States District Court, SDNY
500 Pearl Street, Room 1610
New York, NY 10007

Re: SEC v. Cope, et al., No. 14 Civ. 7575 (DLC)

Your Honor:

We write, on behalf of the Securities & Exchange Commission ("SEC") in the above-captioned matter, in connection with SEC's Order to Show Cause as to why default judgments should not be entered against defendants William Scholander ("Scholander"), Talman Harris ("Harris"), Victor Alfaya ("Alfaya") and Kona Jones Barbera ("Barbera") (Docket Entries 202 through 204). At the time of that filing, the SEC submitted a form of Proposed Judgment for review by the Orders and Judgment Clerk prior to bringing the application to the Court.

Since the filing of this application, the SEC has reached a settlement agreement with Barbera, which was filed with the Orders and Judgment Clerk on Friday evening. Consequently, the SEC is submitting a revised Proposed Judgment that only includes defendants Scholander, Harris and Alfaya. A copy of this Judgment, which is attached hereto, has also been submitted to the Orders and Judgment Clerk today via email.

Moreover, none of those defendants have submitted a response to the Order to Show Cause, which would have been due last Friday, January 8, 2016.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'H A Fischer', is written over the typed name.

Howard A. Fischer
Senior Trial Counsel

Attachment

cc: William Scholander (w/ attachment)
Talman Harris (w/ attachment)
Victor Alfaya (w/ attachment)
Kona Jones Barbera (w/ attachment)